

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF:**

**CHAPTER 13 CASE NO.:**

**TIMOTHY WOOD and  
KIMBERLY WOOD**

**19-14516-JDW**

**LIMITED OBJECTION TO MOTION TO MODIFY  
CHAPTER 13 PLAN AFTER CONFIRMATION**

COMES NOW Locke D. Barkley, Chapter 13 Trustee (the "Trustee"), by and through counsel, and files this Limited Objection to the Motion to Modify Chapter 13 Plan After Confirmation (Dkt. #34) (the "Motion") filed by the Debtors and in support thereof states as follows:

The Debtors failed to file amended schedules evidencing a change in income as required by Miss. Bank. L.R. 3015-1(h)(1). Therefore, the Trustee is unable to determine the Debtors' current monthly net income and whether there is any disposable income.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that this Limited Objection be received and upon a hearing hereon, this Court will enter its order denying the Motion and for such other, further and general relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: October 25, 2021.

Respectfully submitted,

**LOCKE D. BARKLEY**  
**CHAPTER 13 TRUSTEE**

By: /s/ Melanie T. Vardaman  
ATTORNEYS FOR TRUSTEE  
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**CERTIFICATE OF SERVICE**

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Dated: October 25, 2021.

/s/ Melanie T. Vardaman  
MELANIE T. VARDAMAN